

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

<b>In re</b>  <b>SPHERATURE INVESTMENTS LLC, <i>et al.</i>,<sup>1</sup></b>  <b>Debtors.</b>	§ § § § § §	<b>Chapter 11</b>  <b>Case No. 20-42492</b>  <b>Jointly Administered</b>
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**NOTICE OF SERVICE OF DISCOVERY**

PLEASE TAKE NOTICE that Seacret Direct LLC has served the attached *Notice Rule*  
*30(b)(6) Deposition to the Debtors.*

**DATED: October 19, 2021.**

Respectfully submitted,

By: /s/ Annmarie Chiarello  
Phillip Lamberson  
Texas Bar No. 0079413  
plamberson@winstead.com  
Annmarie Chiarello  
Texas Bar No. 24097496  
achiarello@winstead.com  
**WINSTEAD PC**  
500 Winstead Building  
2728 N. Harwood Street  
Dallas, Texas 75201  
(214) 745-5400 (Telephone)  
(214) 745-5390 (Facsimile)

**ATTORNEYS FOR  
SEACRET DIRECT LLC**

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<sup>1</sup> The "Debtors" and the "Plaintiffs" in the above-captioned cases are: Spherature Investments LLC ("Spherature") EIN#5471; Rovia, LLC ("Rovia") EIN#7705; WorldVentures Marketing Holdings, LLC ("WV Marketing Holdings") EIN#3846; WorldVentures Marketplace, LLC ("WV Marketplace") EIN#6264; WorldVentures Marketing, LLC ("WV Marketing") EIN#3255; WorldVentures Services, LLC ("WV Services") EIN#2220.

**CERTIFICATE OF SERVICE**

I hereby certify that on October 19, 2021, notice of this document was electronically mailed to the parties registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/ Annmarie Chiarello

One of Counsel

Phillip Lamberson – State Bar No. 00794134  
Rakhee V. Patel – State Bar No. 00797213  
Annmarie Chiarello – State Bar No. 24097496

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**COUNSEL FOR SEACRET DIRECT, LLC**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**IN RE:**

**SPHERATURE INVESTMENTS LLC,  
*et al.*,**

**DEBTORS.<sup>1</sup>**

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§  
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§

**Chapter 11**

**Case No. 20-42492**

**Jointly Administered**

**TO: The Debtors by and through their attorney of record, Debbie Green, McDermott Will & Emery, LLP, 2501 N. Harwood Street, Suite 1900, Dallas, Texas 75201.**

**NOTICE RULE 30(B)(6) DEPOSITION TO THE DEBTORS**

In accordance with Federal Rule of Civil Procedure 30(b)(6), Seacret Direct, LLC ("Seacret") and pursuant to Court's ruling on the *Debtors' Motion for Protective Order* [Docket No. 549], the Debtors are directed to produce for deposition Simon Davies (as designated by the Debtors) on the topics described below. The deposition(s) will take place on **October 20, 2021, at 11:00 a.m. (Prevailing Central Time)** at the offices of Winstead PC, 2728 N. Harwood Street, Suite 500, Dallas, Texas 75201, before a certified court reporter. The testimony will be

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<sup>1</sup> The "Debtors" in the above-captioned jointly administered chapter 11 bankruptcy cases ("Cases") are: Spherature Investments LLC ("Spherature") EIN#5471; Rovia, LLC ("Rovia") EIN#7705; WorldVentures Marketing Holdings, LLC ("WV Marketing Holdings") EIN#3846; WorldVentures Marketplace, LLC ("WV Marketplace") EIN#6264;

recorded by audio, audiovisual, or stenographic means and will be taken by a court reporter duly authorized by law to administer oaths and take depositions. The deposition will continue thereafter as necessary until completed.

**NOTICE IS FURTHER GIVEN** that the court reporter will appear remotely via Zoom and/or an alternative web-based video conferencing service for the purposes of reporting the proceeding and will not be in the presence of the deponent.

**NOTICE IS FURTHER GIVEN** that instant visual display technology, including but not limited to Zoom, may be used such that documents and exhibits may be displayed to the deponent and all counsel of record, as well as the court reporter's simultaneous transcription of the proceeding.

**NOTICE IS FURTHER GIVEN** that pursuant to Federal Rule of Civil Procedure 30(b)(4), made applicable by the Federal Rule of Bankruptcy Procedure, Seacret and the Debtors stipulate to conducting the deposition by the remote means described above. Parties wishing to attend the deposition should contact Annmarie Chiarello at [achiarello@winstead.com](mailto:achiarello@winstead.com).

**DATED: October 19, 2021.**

Respectfully submitted,

By: /s/ Annmarie Chiarello

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WorldVentures Marketing, LLC ("WV Marketing") EIN#3255; WorldVentures Services, LLC ("WV Services") EIN#2220.

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500 Winstead Building  
2728 N. Harwood Street  
Dallas, Texas 75201  
(214) 745-5400 phone  
(214) 745-5390 fax

**ATTORNEYS FOR  
SEACRET DIRECT, LLC**

**CERTIFICATE OF SERVICE**

I certify that on October 19, 2021, this document was emailed to the email addresses below:

/s/ Annmarie Chiarello  
One of Counsel

Debbie Green,  
Dgreen@mwe.com  
Marcus Helt  
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McDermott Will & Emery, LLP,  
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Suite 1900  
Dallas, Texas 75201

### **TOPICS**

All capitalized terms used herein have the meaning given to them in the complaint.

1. Any factual issues related to whether there are any ongoing material obligations under the Limited Solicitation Agreement dated November 11, 2020 entered into by and between WorldVentures Marketing, LLC and Seacret Direct LLC.